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Attorney for Defendant
MARVA J. GUERRERO

FILED
DISTRICT COURT OF GUAM

APR 15 2005 *mbw*

MARY L.M. MORAN
CLERK OF COURT

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IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CR 05-00013
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING TRIAL DATE AND
vs.)	EXCLUDING TIME
)	
MARVA J. GUERRERO,)	
)	
Defendant.)	
_____)	

IT IS HEREBY STIPULATED AND AGREED by and between the parties herein that the Defendant's Trial presently scheduled for April 19, 2005, at 9:30 a.m., be continued for approximately six weeks, or a date convenient for the Court's calendar. The parties request this continuance as defense counsel requires additional time for further research, investigation and client consultation. Defense counsel requires additional time due to unforeseen and unpredicted staff shortages in the Office of the Federal Public Defender. Our two attorney office has been severely affected by the absence of the other trial attorney who, as a member of the National Guard, was

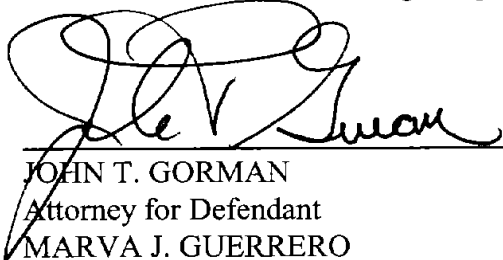
suddenly called to active duty in the Middle East in March, 2005. Our one investigator also resigned in February, 2005, and the new investigator will not be starting until April 18, 2005. These temporary and unexpected personnel problems have severely hampered and compromised our trial preparation efforts. Defense counsel will also be off-island from April 18, 2005 to May 2, 2005.

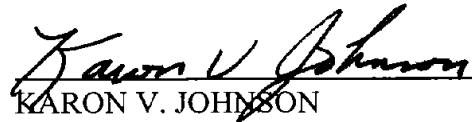
IT IS FURTHER STIPULATED AND AGREED by and between the parties that the time period beginning and including April 19, 2005, to and including June 7, 2005, be excluded from the computations required by the Speedy Trial Act, 18 U.S.C. § 3161.

Therefore, for the reasons set forth in this stipulation, the parties respectfully submit that this continuance is in Mrs. Guerrero's best interests, furthers judicial economy and efficiency and is in society's best interests. Mrs. Guerrero has been consulted and concurs with the proposed continuance. Thus, the ends of justice are best served by this proposed continuance.

IT IS SO STIPULATED:

DATED: Mongmong, Guam, April 11, 2005.


JOHN T. GORMAN
Attorney for Defendant
MARVA J. GUERRERO


KARON V. JOHNSON
Attorney for Plaintiff
UNITED STATES OF AMERICA

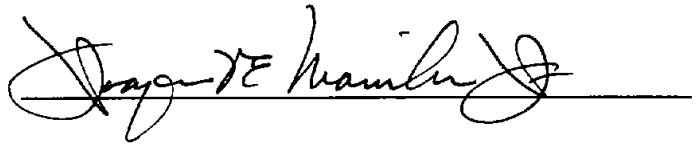
IT IS APPROVED AND SO ORDERED, based on the above stipulated facts , that the ends of justice are best served by continuing the case as requested and outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act,

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18 U.S.C. § 3161. IT IS FURTHER ORDERED that the Defendant's Trial presently scheduled for April 19, 2005 at 9:30 a.m., be continued to June 7, 2005, at 9:30 a.m., and that the time between April 19, 2005 and June 7, 2005, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(8)(A).

DATED: Hagatna, Guam, April 15, 2005.



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